

[Submitting Counsel below]

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

Case No. 23-md-03084-CRB

This Document Relates to:  
  
ALL CASES

**ADMINISTRATIVE MOTION TO  
CONSIDER WHETHER ANOTHER  
PARTY'S MATERIAL SHOULD BE  
FILED UNDER SEAL**

Under Civil Local Rules 7-11 and 79-5(f), Plaintiffs move the Court to consider whether certain material should be sealed. Plaintiffs file these materials under seal out of an abundance of caution because they contain references to documents marked confidential by Uber.

**Material To Be Filed Under Seal**

The material to be filed under seal are portions of Plaintiffs' Motion to Compel Custodial Discovery and related attachments and addenda. Thus, Plaintiffs request the Court consider whether the following should be filed under seal:

Document	Description	Designating Party
Ex. 4 to Declaration of Roopal Luhana	A document created by Uber marked Highly Confidential – Attorneys' Eyes Only.	Uber
Ex. 7 to Declaration of Roopal Luhana	References to sealed material.	Uber
Ex. 8 to Declaration of Roopal Luhana	References to sealed material.	Uber
Ex. 9 to Declaration of Roopal Luhana	References to sealed material.	Uber

1	Ex. 10 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
2	Ex. 11 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
3	Ex. 12 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
4	Ex. 13 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
5	Ex. 14 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
6	Ex. 15 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
7	Ex. 16 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
8	Ex. 17 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
9	Ex. 18 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
10	Ex. 19 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
11	Ex. 20 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
12	Ex. 21 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
13	Ex. 22 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
14	Ex. 23 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
15	Ex. 24 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
16	Ex. 25 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
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1	Ex. 26 to Declaration of	A document produced by Uber	Uber
2	Roopal Luhana	in this litigation	
3	Ex. 27 to Declaration of	A document produced by Uber	Uber
4	Roopal Luhana	in this litigation	
5	Ex. 28 to Declaration of	A document produced by Uber in	Uber
6	Roopal Luhana	this litigation	
7	Ex. 29 to Declaration of	A document produced by Uber in	Uber
8	Roopal Luhana	this litigation	
9	Ex. 30 to Declaration of	A document produced by Uber in	Uber
10	Roopal Luhana	this litigation	
11	Ex. 31 to Declaration of	A document produced by Uber in	Uber
12	Roopal Luhana	this litigation	
13	Ex. 32 to Declaration of	A document produced by Uber in	Uber
14	Roopal Luhana	this litigation	
15	Ex. 33 to Declaration of	A document produced by Uber in	Uber
16	Roopal Luhana	this litigation	
17	Ex. 34 to Declaration of	A document produced by Uber in	Uber
18	Roopal Luhana	this litigation	
19	Ex. 35 to Declaration of	A document produced by Uber in	Uber
20	Roopal Luhana	this litigation	
21	Ex. 36 to Declaration of	A document produced by Uber in	Uber
22	Roopal Luhana	this litigation	
23	Ex. 37 to Declaration of	A document produced by Uber in	Uber
24	Roopal Luhana	this litigation	
25	Ex. 38 to Declaration of	A document produced by Uber in	Uber
26	Roopal Luhana	this litigation	
27	Ex. 39 to Declaration of	A document produced by Uber in	Uber
28	Roopal Luhana	this litigation	

Ex. 40 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
Ex. 41 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
Ex. 42 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
Ex. 43 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
Ex. 44 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
Ex. 45 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
Ex. 46 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
Ex. 47 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
Ex. 48 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
Ex. 49 to Declaration of Roopal Luhana	References to sealed material.	Uber

Under Local Rule 79-5(f)(3), the Designating Party bears the responsibility to establish that all of the designated material is sealable, and must “file a statement and/or declaration as described in subsection (c)(1)” of the Local Rules. None of the information at issue was marked confidential by Plaintiffs.

This motion complies with Civil Local Rule 7-11 and 79-5, and the following attachments accompany this motion:

1. The Declaration of Sarah R. London in Support of this Motion; and
2. A Proposed Order that lists in tabular format all material sought to be sealed.

1 Dated: August 19, 2024

Respectfully submitted,

2 By: /s/ Sarah R. London

3 Sarah R. London (SBN 267093)

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18 Roopal P. Luhana

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25 *Co-Lead Counsel for Plaintiffs*

26 **CERTIFICATE OF SERVICE**

27 I hereby certify that on August 19, 2024, I electronically filed the foregoing document with  
28 the Clerk of the Court using the CM/ECF system, which will automatically send notification  
of the filing to all counsel of record.

Dated: August 19, 2024

By: /s/ Sarah R. London

Sarah R. London